

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA	)	<u>UNDER SEAL</u>
	)	
v.	)	CRIMINAL NO. 2:02cr
	)	
KEITH BULLOCK	)	21 U.S.C. § 846
a/k/a "K.B"	)	Conspiracy to Distribute and Possess
(Counts 1, 9, 11, 19, 30, 33, 34)	)	With Intent to Distribute Cocaine and
	)	Cocaine Base, Commonly Known as
	)	"Crack" Cocaine
SHAWN COPELAND	)	(Count 1)
(Counts 1, 5, 10)	)	
	)	
	)	21 U.S.C. § 841(a)(1) and
DEMARCUS HARRISON	)	18 U.S.C. § 2
a/k/a "Kojak"	)	Distribution and Possession With
(Counts 1-3, 6, 13-14, 22, 24-26,	)	Intent to Distribute Cocaine and a
31)	)	Mixture and Substance Containing
	)	Cocaine Base, Commonly Known as
TYRONE HARRIS	)	"Crack" Cocaine
(Counts 1, 15-16, 20, 27-29)	)	(Counts 2, 4-24, 26-28, 30-35)
	)	
	)	18 U.S.C. § 924(c)
DASHAWN LEARY	)	Possess Firearm During and in
a/k/a "Shawn"	)	Furtherance of a Drug Trafficking
(Counts 1, 12, 21, 23)	)	Crime (Counts 3, 25, 29)
	)	
	)	21 U.S.C. § 853
	)	Criminal Forfeiture
JERMAINE LEWIS	)	
a/k/a "Loungie"	)	
(Counts 1, 4, 8, 17-18)	)	
	)	
	)	
DAVID PITT	)	
(Counts 1, 7, 32, 35)	)	

INDICTMENT

August 2002 TERM – at Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about Fall 1995, the exact date being unknown to the grand jury, and continuously thereafter up to and including the date of this indictment, in the Eastern District of Virginia and elsewhere, KEITH BULLOCK, a/k/a "K.B.," SHAWN COPELAND, DEMARKUS HARRISON, a/k/a "Kojack," TYRONE HARRIS, DASHAWN LEARY, a/k/a "Shawn," JERMAINE LEWIS, a/k/a "Lounge," and DAVID PITT, defendants herein, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with one another and with Quentin Norvell and Ronald Hawkins and with other persons both known and unknown to the grand jury to commit the following offenses:

1. To unlawfully, knowingly and intentionally distribute 5 kilograms or more of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii);
2. To unlawfully, knowingly and intentionally possess with intent to distribute 5 kilograms or more of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii);
3. To unlawfully, knowingly and intentionally distribute 50 grams or more of a mixture and substance containing cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(iii);.
4. To unlawfully, knowingly and intentionally possess with intent to distribute 50 grams

or more of a mixture and substance containing cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(iii);

#### OVERT ACTS

In furtherance of the conspiracy and to accomplish the purposes thereof, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

1. In or about Fall 1995, in the Eastern District of Virginia, Quentin Norvell, Ronald Hawkins, DAVID PITT, DEMARKUS HARRISON and JERMAINE LEWIS possessed with intent to distribute approximately 1 kilogram of cocaine.
2. In or about March 1996, at Portsmouth, Virginia, SHAWN COPELAND distributed approximately 2 1/4 ounces of a mixture and substance containing cocaine base.
3. In or about Summer, 1996, in the Eastern District of Virginia, Quentin Norvell, Ronald Hawkins, JERMAINE LEWIS and two unindicted co-conspirators possessed with intent to distribute approximately two kilograms of cocaine.
4. In or about February 1997, at Portsmouth, Virginia, DAVID PITT possessed with intent to distribute approximately 4 1/2 ounces of a mixture and substance containing cocaine base.
5. In or about February and March 1997, in the Eastern District of Virginia, JERMAINE LEWIS distributed approximately 4 1/2 ounces of cocaine.
6. In or about February and March 1997, in the Eastern District of Virginia, TYRONE HARRIS distributed approximately 2 ounces of a mixture and substance containing cocaine base.
7. In or about Summer 1997, in the Eastern District of Virginia, SHAWN COPELAND distributed approximately 6 1/4 ounces of a mixture and substance containing cocaine base.

8. In or about Fall 1997, in the Eastern District of Virginia, TYRONE HARRIS possessed with intent to distribute approximately 2 1/4 ounces of a mixture and substance containing cocaine base.

9. In or about Fall 1997, at Portsmouth, Virginia, TYRONE HARRIS distributed approximately 1/4 ounce of a mixture and substance containing cocaine base.

10. In or about November and December 1997, at Portsmouth, Virginia, DEMARKUS HARRISON distributed approximately 4 1/2 ounces of a mixture and substance containing cocaine base and possessed a firearm .

11. In or about Summer 1998, at Portsmouth, Virginia, KEITH BULLOCK distributed approximately 2 1/4 ounces of a mixture and substance containing cocaine base.

12. In or about January 1999, at Norfolk, Virginia, JERMAINE LEWIS, Quentin Norvell, Ronald Hawkins and an unindicted co-conspirator possessed with intent to distribute approximately four kilograms of cocaine.

13. In or about Spring 1999, at Portsmouth, Virginia, SHAWN COPELAND possessed with intent to distribute approximately 4 1/2 ounces of a mixture and substance containing cocaine base.

14. In or about Summer 1999, at Portsmouth, Virginia, DEMARKUS HARRISON distributed approximately 1 1/2 ounces of a mixture and substance containing cocaine base.

15. In or about June 1999, in the Eastern District of Virginia, DAVID PITT distributed approximately 25 grams of cocaine.

16. In or about June 1999, in the Eastern District of Virginia, JERMAINE LEWIS distributed approximately 9 grams of cocaine.

17. In or about August and September 1999, in the Eastern District of Virginia, KEITH BULLOCK distributed approximately 2 1/4 ounces of cocaine.

18. In or about October 1999, in the Eastern District of Virginia, SHAWN COPELAND distributed approximately 1 ounce of cocaine.

19. In or about December 1999, in the Eastern District of Virginia, KEITH BULLOCK distributed approximately 2 1/2 kilograms of cocaine to Quentin Norvell, Ronald Hawkins, DASHAWN LEARY and DEMARKUS HARRISON

20. In or about Winter 1999, in the Eastern District of Virginia, Quentin Norvell, Ronald Hawkins, DEMARKUS HARRISON and an unindicted co-conspirator possessed with intent to distribute approximately 2 1/2 kilograms of cocaine.

21. In or about January and February 2000, in the Eastern District of Virginia, TYRONE HARRIS possessed with intent to distribute approximately 1 ounce of cocaine.

22. In or about August 2000, in the Eastern District of Virginia, TYRONE HARRIS distributed approximately 1/2 ounce of a mixture and substance containing cocaine base.

23. On or about August 2, 2000, JERMAINE LEWIS aided and abetted the possession with intent to distribute of approximately 47.9 grams of cocaine and approximately 2.36 grams of a mixture and substance containing cocaine base in the Eastern District of Virginia.

24. In or about November 2000, in the Eastern District of Virginia, KEITH BULLOCK distributed approximately 2 kilograms of cocaine.

25. In or about November 2000, at Portsmouth, Virginia, TYRONE HARRIS distributed approximately 1/2 ounce of a mixture and substance containing cocaine base.

26. In or about November 2000, in the Eastern District of Virginia, DASHAWN LEARY

and DEMARKUS HARRISON each possessed with intent to distribute approximately 1 kilogram of cocaine.

27. In or about December 2000, and January 2001, at Portsmouth, Virginia, DASHAWN LEARY possessed with intent to distribute approximately 1 kilogram of cocaine.

28. On or about February 15, 2001, at Portsmouth, Virginia, DEMARKUS HARRISON possessed with intent to distribute approximately 26.6 grams of a mixture and substance containing cocaine base and possessed a firearm.

29. In or about March, 2001, in the Eastern District of Virginia, DEMARKUS HARRISON distributed a quantity of a mixture and substance containing cocaine base to Quentin Norvell, who then distributed 4 ½ ounces of that quantity to TYRONE HARRIS.

30. On or about April 3, 2001, at Portsmouth, Virginia, TYRONE HARRIS possessed with intent to distribute approximately 28.9 grams of a mixture and substance containing cocaine base and possessed a firearm.

31. On or about April 20, 2001, at Norfolk, Virginia, KEITH BULLOCK distributed approximately 284.7 grams of cocaine.

32. On or about June 7, 2001, in the Eastern District of Virginia, DEMARKUS HARRISON distributed approximately 155.2 grams of cocaine.

33. On or about June 26, 2001, at Norfolk, Virginia, DAVID PITT distributed approximately 149.2 grams of cocaine.

34. On or about June 29, 2001, at Chesapeake, Virginia, KEITH BULLOCK distributed approximately 157.7 grams of cocaine.

35. On or about November 27, 2001, at Chesapeake, Virginia, KEITH BULLOCK

distributed approximately 290.4 grams of cocaine.

36. In or about January 2002, at Portsmouth, Virginia, SHAWN COPELAND solicited Quentin Norvell to obtain 9 ounces of cocaine from DEMARKUS HARRISON.

37. On or about February 16 and 17, 2002, at Portsmouth, Virginia, DAVID PITT distributed approximately 28 grams of a mixture and substance containing cocaine base.

(All in violation of Title 21 United States Code, Section 846.)

### COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or about November and December 1997, at Portsmouth, Virginia, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 4 ½ ounces of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(iii).)

### COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

In or about November and December 1997, at Portsmouth, Virginia, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance, as alleged in Count Two of this Indictment.

(In violation of Title 18, United States Code, Section 924(c)(1).)

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

In or about January 1999, at Norfolk, Virginia, within the Eastern District of Virginia, JERMAINE LEWIS did unlawfully, knowingly and intentionally possess with intent to distribute approximately 4 kilograms of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii).)

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

In or about Spring 1999, at Portsmouth, Virginia, within the Eastern District of Virginia, SHAWN COPELAND, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 4 ½ ounces of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(iii).)



COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

In or about Summer 1999, at Portsmouth, Virginia, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally distribute approximately 1 1/2 ounces of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(iii).)

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

In or about June 1999, within the Eastern District of Virginia, DAVID PITT, did unlawfully, knowingly and intentionally distribute approximately 25 grams of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

In or about June, 1999, within the Eastern District of Virginia, JERMAINE LEWIS, did unlawfully, knowingly and intentionally distribute approximately 9 grams of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

In or about August and September 1999, within the Eastern District of Virginia, KEITH BULLOCK, did unlawfully, knowingly and intentionally distribute approximately 2 1/4 ounces of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

In or about October 1999, within the Eastern District of Virginia, SHAWN COPELAND, did unlawfully, knowingly and intentionally distribute approximately 1 ounce of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

In or about December 1999, within the Eastern District of Virginia, KEITH BULLOCK, did unlawfully, knowingly and intentionally distribute approximately 2 ½ kilograms of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(iii) and Title 18 United States Code, Section 2.)

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

In or about December 1999, within the Eastern District of Virginia, DASHAWN LEARY, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 2 ½ kilograms of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii) and Title 18, United State Code, Section 2.)

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

In or about December, 1999, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 2 ½ kilograms of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii) and Title 18, United State Code, Section 2.)

**COUNT FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

In or about Winter 1999, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 2 ½ kilograms of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii) and Title 18, United State Code, Section 2.)

**COUNT FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

In or about January and February 2000, within the Eastern District of Virginia, TYRONE HARRIS, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 1 ounce of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

**COUNT SIXTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

In or about August 2000, within the Eastern District of Virginia, TYRONE HARRIS, did unlawfully, knowingly and intentionally distribute approximately ½ ounce cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(iii).)

**COUNT SEVENTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 2, 2000, within the Eastern District of Virginia, JERMAINE LEWIS, did unlawfully, knowingly and intentionally aid and abet the possession with intent to distribute approximately 47.9 grams of a cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2000, within the Eastern District of Virginia, JERMAINE LEWIS, did unlawfully, knowingly and intentionally aid and abet the possession with intent to distribute approximately 2.36 grams of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

In or about November 2000, within the Eastern District of Virginia, KEITH BULLOCK, did unlawfully, knowingly and intentionally distribute approximately 2 kilograms of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii).)

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

In or about November 2000, at Portsmouth, Virginia, within the Eastern District of Virginia, TYRONE HARRIS, did unlawfully, knowingly and intentionally distribute approximately ½ ounce of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(iii).)

COUNT TWENTY ONE

THE GRAND JURY FURTHER CHARGES THAT:

In or about November 2000, within the Eastern District of Virginia, DASHAWN LEARY, did unlawfully, knowingly and intentionally distribute approximately 1 kilogram of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii).)



COUNT TWENTY TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or about November 2000, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally distribute approximately 1 kilogram of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii).)

COUNT TWENTY THREE

THE GRAND JURY FURTHER CHARGES THAT:

In or about December 2000 and January 2001, at Portsmouth, Virginia, within the Eastern District of Virginia, DASHAWN LEARY, did unlawfully, knowingly and intentionally distribute approximately 1 kilogram of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii).)

COUNT TWENTY FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 15, 2001, at Portsmouth, Virginia, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 26.6 grams of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(iii).)

COUNT TWENTY FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 15, 2001, at Portsmouth, Virginia, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance, as alleged in Count 24 of this Indictment.

(In violation of Title 18, United States Code, Section 924(c)(1).)

COUNT TWENTY SIX

THE GRAND JURY FURTHER CHARGES THAT:

In or about March, 2001, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally distribute approximately 4 ½ ounces of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(iii).)

COUNT TWENTY SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

In or about March 2001, within the Eastern District of Virginia, TYRONE HARRIS, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 4 ½ ounces of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(iii).)

COUNT TWENTY EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2001, at Portsmouth, Virginia, within the Eastern District of Virginia, TYRONE HARRIS, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 28.9 grams of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(iii).)

COUNT TWENTY NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2001, at Portsmouth, Virginia, within the Eastern District of Virginia, TYRONE HARRIS, did unlawfully, knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute approximately cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance, as alleged in Count 28 of this Indictment.

(In violation of Title 18, United States Code, Section 924(c)(1).)

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 20, 2001, at Norfolk, Virginia, within the Eastern District of Virginia, KEITH BULLOCK, did unlawfully, knowingly and intentionally distribute approximately 284.7 grams of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT THIRTY ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 7, 2001, within the Eastern District of Virginia, DEMARKUS HARRISON, did unlawfully, knowingly and intentionally distribute approximately 155.2 grams of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT THIRTY TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 26, 2001, at Norfolk, Virginia, within the Eastern District of Virginia, DAVID PITT, did unlawfully, knowingly and intentionally distribute approximately 149.2 grams of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT THIRTY THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 29, 2001, at Chesapeake, Virginia, within the Eastern District of Virginia, KEITH BULLOCK, did unlawfully, knowingly and intentionally distribute approximately 157.7 grams of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT THIRTY FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 27, 2001, at Chesapeake, Virginia, within the Eastern District of Virginia, KEITH BULLOCK, did unlawfully, knowingly and intentionally distribute approximately 290.4 grams of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).)

COUNT THIRTY FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16 and 17, 2002, at Portsmouth, Virginia, within the Eastern District of Virginia, DAVID PITT, did unlawfully, knowingly and intentionally distribute approximately 28 grams of a mixture and substance containing cocaine base, commonly known as "crack" cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(iii).)

FORFEITURE

A. The defendants, KEITH BULLOCK, SHAWN COPELAND, DEMARKUS HARRISON, TYRONE HARRIS, DASHAWN LEARY, JERMAINE LEWIS and DAVID PITT if convicted of any violation alleged in this Indictment, namely Count One --, Conspiracy To Distribute and Possess with Intent to Distribute Cocaine and Cocaine Base and Counts Two, Four through Twenty Four, Twenty Six through Twenty Eight and Thirty through Thirty Five - Distribution and Possession With Intent to Distribute Cocaine and Cocaine Base, shall forfeit to the United States:

1. any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation; and
2. any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

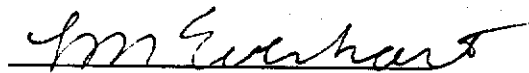
(All in violation of Title 21, United States Code, Section 853)

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

PAUL J. McNULTY  
UNITED STATES ATTORNEY

By:



Laura M. Everhart  
Assistant United States Attorney